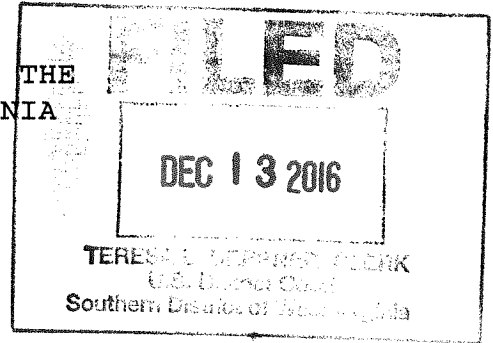


~~SEALED~~

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
HUNTINGTON GRAND JURY 2016
DECEMBER 13, 2016 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:16-cr-00227

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 2
21 U.S.C. § 856(a)(2)

MARK STEVEN BUSH, JR.
 also known as "Unc"
BRANDON R. WARE
 also known as "Scant"
DERRICK C. MORRIS
 also known as "D"
CHARLES DESHAWN LOCKHART
 also known as "C.P."
TIQUAN R. LANG
 also known as "T.Q."
KIEYONDA ANNETTE-MARIE TOLER
 also known as "Yonnie"
DOROTHY D. PANNELL
JESSICA ANN BARNETT

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

1. From at least November 2014 to on or about June 8, 2016, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, and elsewhere, defendants MARK STEVEN BUSH, JR., also known as "Unc," BRANDON R. WARE, also known as "Scant," DERRICK C. MORRIS, also known as "D," CHARLES DESHAWN LOCKHART, also known as "C.P.," TIQUAN R. LANG, also known

as "T.Q.," KIEYONDA ANNETTE-MARIE TOLER, also known as "Yonnie," DOROTHY D. PANNELL, and JESSICA BARNETT, together with persons both known and unknown to the Grand Jury, knowingly conspired to commit offenses in violation of 21 U.S.C. § 841(a)(1), that is, knowingly and intentionally to distribute a quantity of heroin, a Schedule I controlled substance, and a quantity of oxymorphone, a Schedule II controlled substance.

QUANTITY OF HEROIN INVOLVED IN THE CONSPIRACY

2. With respect to defendants MARK STEVEN BUSH, JR., also known as "Unc," BRANDON R. WARE, also known as "Scant," DERRICK C. MORRIS, also known as "D," CHARLES DESHAWN LOCKHART, also known as "C.P.," their conduct as a member of the conspiracy charged in Count One involved 100 grams or more of heroin, a Schedule I controlled substance.

3. With respect to defendants TIQUAN R. LANG, also known as "T.Q.," KIEYONDA ANNETTE-MARIE TOLER, also known as "Yonnie," DOROTHY D. PANNELL, and JESSICA BARNETT, their conduct as a member of the conspiracy charged in Count One involved a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about November 14, 2014, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendants BRANDON R. WARE, also known as "Scant," and CHARLES DESHAWN LOCKHART, also known as "C.P.," each aided and abetted by the other, knowingly and intentionally possessed with intent to distribute a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THREE

On or about October 28, 2015, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant MARK STEVEN BUSH, JR., also known as "Unc," knowingly and intentionally distributed a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

On or about October 30, 2015, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant CHARLES DESHAWN LOCKHART, also known as "C.P.," knowingly and intentionally distributed a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

On or about December 3, 2015, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant KIEYONDA ANNETTE-MARIE TOLER, also known as "Yonnie," knowingly and intentionally possessed with intent to distribute a quantity of oxymorphone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

From on or about February 2, 2016, to on or about April 25, 2016, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant JESSICA ANN BARNETT, while managing and controlling a residence at 5941 Nathan Drive, Huntington, West Virginia, as the lessee, knowingly and intentionally made available for use, with or without compensation, said residence for the purpose of unlawfully storing and distributing heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT SEVEN

On or about March 10, 2016, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant CHARLES DESHAWN LOCKHART, also known as "C.P.," knowingly and intentionally possessed with intent to distribute a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

On or about May 6, 2016, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant MARK STEVEN BUSH, JR., also known as "Unc," knowingly and intentionally distributed a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINE

On or about May 23, 2016, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant CHARLES DESHAWN LOCKHART, also known as "C.P.," knowingly and intentionally possessed with intent to distribute a quantity of oxymorphone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

On or about May 23, 2016, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant DOROTHY D. PANNELL knowingly and intentionally possessed with intent to distribute a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT ELEVEN

On or about June 8, 2016, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant MARK STEVEN BUSH, JR., also known as "Unc," knowingly and intentionally possessed with intent to distribute a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

CAROL A. CASTO
United States Attorney

By:

A handwritten signature in black ink, appearing to read "R. Gregory McVey", is written over a horizontal line.

R. Gregory McVey
Assistant United States Attorney